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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221463
Party	Defendant Bartsch, Scott
Correspondence Address	BARTSCH, SCOTT 414 1/2 N SIERRA BONITA AVE LOS ANGELES, CA 90036-2462 tyler@starbabyworld.com
Submission	Answer
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Date	07/21/2015
Attachments	Answer - 86303095 (Hockeywood).pdf(93337 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No. 86/303095
Published in the *Official Gazette* of October 14, 2014
Mark: HOCKEYWOOD

THE LOS ANGELES KNCS HOCKEY)	
CLUB, L.P.,)	
)	
Opposer,)	
)	
v.)	
)	Opposition No. 91221463
SCOTT BARTSCH)	
Applicant)	
)	

APPLICANT’S ANSWER TO OPPOSITION

Applicant, SCOTT BARTSCH (“Applicant”) answers The Los Angeles Kings Hockey Club, L.P.’s (“Kings”) Notice of Opposition as follows:

1. As to Paragraph 1, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.
2. As to Paragraph 2, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.
3. As to Paragraph 3, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.
4. As to Paragraph 4, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.

5. As to Paragraph 5, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.

6. As to Paragraph 6, Applicant has insufficient information to admit or deny the allegations contained within this paragraph, and on that basis denies each and every such allegation.

7. As to Paragraph 7, Applicant denies each and every allegation contained within this paragraph.

8. As to Paragraph 8, Applicant admits that on June 6, 2014, he filed an intent-to-use application for HOCKEYWOOD in connection with “Athletic apparel, namely, shirts, pants, jackets, footwear, hats and caps, athletic uniforms.”

9. As to Paragraph 9, Applicant admits Kings won the Stanley Cup Championship on June 13, 2014. Applicant also admits that it is located in Los Angeles. Other than as expressly admitted, Applicant denies each and every allegation contained in this paragraph.

10. As to Paragraph 10, Applicant admits that if Applicant obtains registration of the Application opposed herein, he would obtain a prima facie exclusive right to use of HOCKEYWOOD as a trademark. Other than as expressly admitted, Applicant denies each and every allegation contained in this paragraph.

11. As to Paragraph 11, Applicant denies each and every allegation contained within this paragraph.

12. As to Paragraph 12, Applicant denies each and every allegation contained within this paragraph.

13. As to Paragraph 13, Applicant denies each and every allegation contained within this paragraph.

14. As to Paragraph 14, Applicant denies each and every allegation contained within this paragraph.

AFFIRMATIVE DEFENSES

15. As a separate and affirmative defense, Applicant alleges that Opposer has failed to allege sufficient facts to constitute circumstances for an opposition.

16. As a separate and affirmative defense, Applicant alleges that Opposer’s Opposition is barred by the doctrine of estoppel.

17. As a separate and affirmative defense, Applicant alleges that Opposer's Opposition is barred by the doctrine of unclean hands.

18. Applicant presently has insufficient knowledge or information upon which to form a belief as to whether it may have additional affirmative defenses available. Applicant reserves the right to assert additional defenses in the event discovery or further analysis indicates that additional unknown or unstated affirmative defenses would be available.

PRAYER

WHEREFORE, Applicant SCOTT BARTSCH requests that Opposer's Opposition be overruled in favor of Application and that Applicant's Application Serial No. 86/303095 for HOCKEYWOOD proceed in the registration process.

Date: July 21, 2015

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2015, I served the foregoing **APPLICANT'S ANSWER TO OPPOSITION** on the interested parties in this action at their last known address, by placing a true and correct copy thereof in a sealed envelope with postage thereon fully prepaid in the United States Mail at Beverly Hills, California, addressed as set forth below:

Jia Wang
NHL Enterprises, L.P.
1185 Avenue of the Americas, 15th Floor
New York, NY 10036

Dated: July 21, 2015



David N. Sharifi